

EXHIBIT C  
Affidavit of  
Dr. Catherine Rodriguez

May 31, 2023

To Whom it May Concern:

My name is Dr. Catherine R. Rodriguez, and I was elected to the Leon Valley City Council in May of 2018. On or about that time, Mrs. Denise Frederick was our Leon Valley City attorney and served on the dais with the council. I can honestly say that I do not recall an instance when Council member Benny Martinez demonstrated even one iota of respect for Mrs. Frederick as a woman or as our legal representative. I found that behavior to be repulsive as he repeatedly disregarded her legal opinion.

On multiple occasions during council meetings and during Executive sessions, Mr. Martinez was extremely confrontational when she would provide her legal opinion on items such as junk vehicles, garage sales, the authority of the police department, the conduct of the council and many other city ordinances. Instead of call for an Executive session with the entire council or request a private meeting with Mrs. Frederick, Mr. Martinez, chose to be verbally combative and demeaning in the open for the City of Leon Valley Citizens to clamor to his side as if he were acting with any decency. Many an instance my fellow council members called for Mr. Martinez to tone down his behavior and act more professional. It was in those instances that he almost always became more aggressive and hostile.

Mr. Martinez continued to denounce her education and make light of her knowledge of the law. Mrs. Frederick sought to demonstrate her knowledge and education but more times than not, the exhibition of his behaviors appeared to make Ms. Frederick look defeated and beat. Subsequently to the myriad of incidents, when Will Bradshaw took office, both he and Mr. Martinez, would demean and belittle Mrs. Frederick to no end. Both attempted to take a subject and run it around and around in a perceived attempt to see if Mrs. Frederick would trip up or make a decision in haste.

I myself found this conduct disturbing and came to understand that no matter how many attempts myself and the fellow council members tried to get Mr. Martinez and Mr. Bradshaw to act with any semblance of decorum, their humiliation of Mrs. Frederick just seemed to fuel their arrogance. I find it unfortunate that the remainder of the council were not strong enough to get these individuals to stop. Even after attempts to address their behavior, the Mayor herself continued to condone these behaviors and made it very difficult for Mrs. Frederick to properly do her due diligence as our city attorney.

Should you have any questions or concerns, please do not hesitate to reach out and let me know. I can be reached at 210 416-1498 or by email at [catherine9973@yahoo.com](mailto:catherine9973@yahoo.com)

Respectfully,

  
Dr. Catherine R. Rodriguez

State of Texas

County of Bexar

This instrument was acknowledged before me this 2nd day of June, 20 23, by  
CR Rodriguez

Mercy Esquivel  
Mercy Esquivel

Notary Public, State of Texas

